

**UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA**

INTERNATIONAL BROTHERHOOD OF
ELECTRICAL WORKERS LOCAL 98 PENSION
FUND, on behalf of itself and all others
similarly situated,

Plaintiff,
vs.

DELOITTE & TOUCHE LLP and DELOTTE
LLP,

Defendants.

Case No. 3:19-cv-3304

**DECLARATION OF LAURA H. POSNER IN SUPPORT OF NOTICE OF
SUPPLEMENTAL INFORMATION AND AUTHORITY REGARDING
MARCH 16, 2023, MOTIONS HEARING**

I, Laura H. Posner, hereby declare as follows:

1. I am a partner with the law firm Cohen Milstein Sellers & Toll PLLC (“Cohen Milstein” or “Lead Counsel”) and am counsel for Lead Plaintiff International Brotherhood of Electrical Workers Local 98 Pension Fund (“Plaintiff” or the “Pension Fund”). I submit this declaration in support of Plaintiff’s Notice of Supplemental Information and Authority Regarding March 16, 2023, Motions Hearing.

2. On March 9, 2023, I received a letter from the Peter F. Flaminii, III, Contract Administrator for the Pension Fund. In that letter, attached hereto as Exhibit 1, Mr. Flaminii provided the following extract from the minutes of the November 22, 2022 meeting of the Board of Trustees of the Pension Fund, which “were presented, reviewed and approved at the meeting of the Board of Trustees held on February 24, 2023”:

Being fully apprised of the facts by Fund co-counsel, the Trustees authorize the Fund’s continued participation as lead plaintiff in the matter of *International Brotherhood of Electrical Workers Local 98 Pension Fund v. Deloitte & Touche LLP et. al.*, 19-cv-03304-MBS (D.S.C.). Class counsel shall report all developments as they occur and

any decisions normally reserved to the client in litigation shall be presented to the Board of Trustees, or a properly-constituted subcommittee thereof, for decision.

Executed on this 10th day of March, 2023, in New York, New York.



Laura H. Posner

*Lead Counsel for the Proposed Class and
Counsel for Lead Plaintiff International
Brotherhood of Electrical Workers Local 98
Pension Fund*